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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 TERI VILLAFANA,
9 Plaintiff,
10 vs.
11 T-Mobile,
12 Defendant.

Case No. 2:21-cv-00661-GMN-DJA

STIPULATION AND ORDER
REGARDING TIMELINESS OF
FILING FROM EEOC RIGHT TO SUE

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15 Plaintiff, Teri Villafana, and Defendant, T-Mobile, by and through respective counsel,
16 file this Stipulation and Order stipulating in good faith as follows:

17 Plaintiff's claims for race discrimination and retaliation as specifically set forth in her
18 EEOC Charges of Discrimination (EEOC Nos. 487-2020-01309 and 487-2020-00138 (ECF No.
19 5 at pp. 6-7) were filed within 90 days of Plaintiff's receipt of the EEOC right to sue notices.

20 This stipulation is based upon Plaintiff's representation that her actual receipt of the
21 EEOC right to sue notices for the above-referenced Charges was January 29, 2021, and is
22 further based upon the Nevada Governor's Emergency Directive 009 Section 2 providing tolling
23 of Nevada state statutes of limitations. The Parties wish to resolve the single issue of Plaintiff's
24 timely filing of these specific race discrimination and retaliation claims in Federal Court. The
25 stipulation on this singular fact is without waiving any other defense Defendant may have to any
26 claims in this matter including but not limited to timeliness of filing the original charges with
27 the EEOC/NERC, timeliness of any other claims, exhaustion of administrative remedies, or any
28 other substantive or procedural defenses. The parties submit that this stipulation is made in
good faith and intended to promote judicial economy.

1 DATED this 31th of August, 2021.

DATED this 31th of August, 2021.

2 LAW OFFICE OF MARY F. CHAPMAN,
3 LTD.

LITTLER MENDELSON

4 By: /s/ Mary F. Chapman

By: /s/ Amy L. Thompson

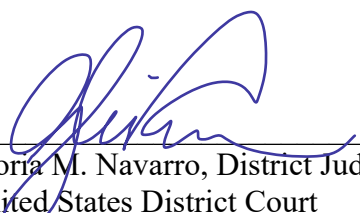
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Attorneys for Defendant

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13 **ORDER**

14 **IT IS SO ORDERED.**

15 Dated this 8 day of September, 2021.

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20 Gloria M. Navarro, District Judge
United States District Court
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